

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS DIVISION**

NICOLE DENISE NELSON,)
individually and on behalf of all others)
similarly situated,)

Plaintiff,

Case No.: 3:17-cv-00183

V.

GREAT LAKES EDUCATIONAL LOAN)
SERVICES, INC., and)
DOE DEFENDANTS 1-10,)

Defendants.

**DEFENDANT GREAT LAKES EDUCATIONAL LOAN SERVICES, INC.'S MOTION
FOR ORAL ARGUMENT ON ITS MOTION TO DISMISS AND MOTION TO STRIKE**

Defendant Great Lakes Educational Loan Services, Inc. (“Great Lakes”) respectfully moves, pursuant to Local Rule 7.1(h), for oral argument on Great Lakes’ Motion to Dismiss Plaintiff’s Class Action Complaint and Motion to Strike. On April 24, 2017, Great Lakes filed both its Motion to Dismiss and Motion to Strike.

In support of its request for oral argument, Great Lakes avers that oral argument will assist the Court in ruling on the Motion to Dismiss, because it will allow the parties to respond to the Court's questions about federal law governing the student loan servicing industry and why preemption applies to bar Plaintiff's claims. The preemption issue is dispositive of Plaintiff's claims that Great Lakes respectfully submits is appropriate for oral argument. Oral argument will also permit the parties to address the reasons that Plaintiff has failed to state a claim for her claims under Illinois law.

WHEREFORE, Defendant Great Lakes Educational Loans Services, Inc. respectfully requests that the Court grant its Motion and schedule oral argument on Great Lakes' Motion to Dismiss Plaintiff's Class Action Complaint and Motion to Strike, and for such other and further relief as the Court deems just under the circumstances.

Respectfully submitted,

Dated: April 25, 2017

GREENSFELDER, HEMKER & GALE, P.C.

By /s/ John C. Drake

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Attorneys for Defendant Great Lakes Educational Loan Services, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on April 25, 2017, I electronically filed the foregoing Motion for Oral Argument with the Clerk of the Court for the United States District Court, Southern District of Illinois by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the Southern District CM/ECF system.

/s/ John C. Drake
